

EXHIBIT J

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE: JOSHUA MOORE REBECCA KITZMILLER-MOORE DEBTORS	§ § § § §	CASE NO. 18-10395-HCM CHAPTER 13
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**CHAPTER 13 TRUSTEE’S OBJECTION TO CONFIRMATION OF PROPOSED
CHAPTER 13 PLAN AND REQUEST FOR INTERIM DISBURSEMENT**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Comes now Deborah B. Langehennig, Chapter 13 Trustee (hereinafter “Trustee”) in the above-captioned and numbered bankruptcy proceeding, and files this *Objection to Confirmation of Proposed Chapter 13 Plan and Request for Interim Disbursement*. The Trustee submits the proposed Plan does not meet the requirements of 11 U.S.C. § 1325(a) and/or § 1325(b) and in support would respectfully show the Court that at the Section 341 Meeting of Creditors, the Trustee or a representative of the Trustee requested action on the following issues:

I.

The Trustee requests that the Debtors amend the schedules and Statement of Financial Affairs to disclose all business entity interests owned by the Debtors and to assign a value for each business entity. The Trustee also requests that the Debtors amend Schedule I to update average business income from all sources.

II.

The Trustee requests that the Debtors provide bank statements for all business entities in which the Debtors own an interest, for all months of 2018.

The Trustee further requests that the Debtors submit each month post-petition, cash basis, consolidated profit and loss statements which identify the source of revenue (each business entity).

III.

The profit and loss statements received by the Trustee show higher net revenue and therefore, additional disposable income.

To the extent that the Trustee has funds on hand at the time of the next and future disbursements to creditors, the Trustee requests that should confirmation of the proposed Plan be denied or reset, she be authorized to immediately disburse, pre-confirmation, the funds on hand to creditors with allowed secured and/or priority claims provided for in the proposed Plan on a pro rata basis, along with the payment of the Trustee fee for disbursement, on a monthly basis.

PRAYER

The Trustee requests that the Debtors appear at the confirmation hearing. If these issues are not fully resolved, the Trustee requests that confirmation be denied and that the case be dismissed.

Respectfully submitted,

/s/ Deborah B. Langehennig

Deborah B. Langehennig, Chapter 13 Trustee
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**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
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IN RE:

CASE NO. 18-10395-HCM

JOSHUA EUGENE MOORE

REBECCA LYNN KITZMILLER-MOORE

DEBTORS

CHAPTER 13

CERTIFICATE OF SERVICE

I, Deborah B. Langehennig, certify that a true and correct copy of the Chapter 13 Trustee's Objection to Confirmation of Proposed Chapter 13 Plan and Request for Interim Disbursement has been mailed by US Mail (unless otherwise notated) to the Debtors and the Debtors' Attorney of Record at the addresses listed below on or about June 26, 2018.

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JOSHUA EUGENE MOORE
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Respectfully submitted,

/s/ Deborah B. Langehennig

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